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Attorneys for Defendants
HSBC MORTGAGE CORPORATION (USA) AND
HSBC BANK USA, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Philip Wong, Frederic Chaussy, and Leslie Marie Shearn, individually, on behalf of all others similarly situated, and on behalf of the general public,

Plaintiffs.

v.

HSBC Mortgage Corporation (USA);
HSBC Bank USA, N.A.; and DOES 1
through 50, inclusive.

Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF HENRY YIP IN
SUPPORT OF DEFENDANTS' MOTION
FOR RULE 11(C) SANCTIONS**

Date: June 6, 2008
Time: 9:00 a.m.
Courtroom: 7 (19th Floor)
Judge: Hon. Maxine M. Chesney

I, Henry E. Yip, hereby declare and state:

1. I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify to the following:

2. I am employed by HSBC Technology & Services (USA) Inc. (hereinafter "HTSU"). My job title is Director-Network Systems DSS E-Mail Operations. In my job, I oversee the email systems for various affiliates of HSBC North America Holdings, Inc. including HSBC Bank USA, NA (hereinafter "HBUS") and HSBC Mortgage Corporation (USA) (hereinafter "HCMU").

3. Attached hereto as Exhibit A is a true and correct copy of the "HSBC North America Holdings, Inc. E-mail Policy," available on the corporate intranet.

I declare under penalty of perjury under the laws of the States of California and New York and the United States of America that the foregoing declaration is true and correct to the best of my personal knowledge.

Executed this 25th day of April 2008, in New York, New York.

HENRY E. YIP

Firmwide: 85027166, J 023404, 1043

EXHIBIT A

**THIS EXHIBIT IS FILED WITH DEFENDANTS' MOTION FOR
ADMINISTRATIVE RELIEF TO FILE UNDER SEAL EXHIBITS IN SUPPORT
OF DEFENDANTS' MOTION FOR RULE 11(C) SANCTIONS**